

SIDLEY

SIDLEY AUSTIN LLP
787 SEVENTH AVENUE
NEW YORK, NY 10019
+1 212 839 5300
+1 212 839 5599 FAX

AMERICA • ASIA PACIFIC • EUROPE

+1 212 839 5612
SABERG@SIDLEY.COM

January 3, 2023

Via ECF

The Honorable Naomi R. Buchwald
United States District Judge
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: United States v. Cabrera et al., 22-CR-10 (NRB)

Dear Judge Buchwald:

We write on behalf of the defendants in the above referenced action to request a four-week extension of time in which defendants may file their pre-trial motions. This is the defendants' first request for an extension. The Government consents to this request.

This extension of time will allow the parties to more carefully address the issues, especially in light of the superseder indictment the Government filed on December 16, 2022.

Defendants' pre-trial motions are currently due on January 11, 2023, and the defendants respectfully request an extension to February 10, 2023.

Thank you for the Court's attention to this matter.

Respectfully submitted,

/s/ Sarah E. Aberg
Sarah E. Aberg
Counsel for Willie Harris

cc: David Robles, AUSA (via ECF and e-mail)
Kaylan Elizabeth Lasky, AUSA (via ECF and e-mail)
Dawn M. Florio, Counsel for Jesus Cabrera (via ECF)
Glenn Andrew Garber and Javier Alberto Solano, Counsel for Michael Amaya (via ECF)

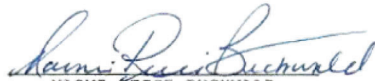
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Steven G. Brill and James L. Healy, Counsel for Alberto Concepcion (via ECF)
Carlos M. Santiago, Jr., Counsel for Humberto Borges (via ECF)
Richard S. Rosenberg, Counsel for Frankie Capellan (via ECF)
Esereosonobrugue J. Onaodowan, Counsel for Jose Figueroa (via ECF)

Application granted. Defendants' pre-trial motions are due on February 10, 2023. Speedy trial time is excluded through February 17, 2023 pursuant to 18 U.S.C. § 3161(h)(7)(A).

SO ORDERED.



NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: New York, New York
January 4, 2023